

9. The aforesaid Proof of Claim is untimely.

10. Fulton Bank, NA has no valid excuse on why it filed an untimely Proof of Claim.

Accordingly, Fulton Bank, NA's Proof of Claim must be disallowed.

WHEREFORE, Debtors request the Court to disallow the Proofs of Claim of Fulton Bank, NA and enter the attached Order.

Respectfully Submitted,

LUONGO BELLWOAR LLP

By: /s/ Stanley E. Luongo, Jr.

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Date: March 16, 2018

